

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

APR 08 2021

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Kut, DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

DEREK WAYNE BALDWIN,

Defendant.

Case No.

CR 21-078 HE

Violations:

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

18 U.S.C. § 2252A(a)(2)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1

(Production of Child Pornography)

Between on or about May 17, 2020, and on or about May 19, 2020, in the Western District of Oklahoma,

----- **DEREK WAYNE BALDWIN** -----

used and attempted to use a minor—known to the Grand Jury as Jane Doe—to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that the visual depictions would be transported and transmitted using a means and facility of interstate or foreign commerce and in and affecting interstate and foreign commerce; and the visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting

interstate and foreign commerce by any means, including by computer; and such visual depictions were actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 2
(Production of Child Pornography)

On or about December 13, 2020, in the Western District of Oklahoma,

----- **DEREK WAYNE BALDWIN** -----

used and attempted to use a minor—known to the Grand Jury as Jane Doe—to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that the visual depictions would be transported and transmitted using a means and facility of interstate or foreign commerce and in and affecting interstate and foreign commerce, and the visual depictions would be produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depictions were actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 3
(Distribution of Child Pornography)

Between on or about May 17, 2020, and on or about March 12, 2021, in the Western District of Oklahoma,

----- **DEREK WAYNE BALDWIN** -----

knowingly distributed child pornography using a means and facility of interstate and foreign commerce, namely, the Internet.

All in violation of Title 18, United States Code, Section 2252A(a)(2), the penalty for which is found at Title 18, United States Code, Section 2252A(b)(1).

A TRUE BILL



FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER
Acting United States Attorney



BOW BOTTOMLY
Assistant United States Attorney